

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service
Commission held at its office in
Jefferson City on the 19th day
of August, 2015.

In the Matter of the Staff Investigation into the
Adequacy of the Call Centers Serving
Missouri-American Water Company

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File No. WO-2014-0362

**ORDER ACCEPTING STAFF'S REPORT, DIRECTING MISSOURI-AMERICAN TO
TAKE CERTAIN ACTIONS, AND CLOSING FILE**

Issue Date: August 19, 2015

Effective Date: August 29, 2015

On June 25, 2014, the Commission directed its Staff to investigate the adequacy of the customer service call centers operated by Missouri-American Water Company. Staff requested authority to conduct that investigation because of its concern about a number of complaints from customers about the courtesy and knowledge of call center personnel. Staff conducted an extensive investigation and filed a final report on June 15, 2015.

Staff's report made the following recommendations for action to be taken by Missouri-American to address problems identified by Staff:

- A. Ensure that Customer Service Representatives are sufficiently trained to respond in a timely manner to all customer inquiries, including those regarding customer billing statements, service territories served, and other inquiries. Evaluate training materials periodically. Evaluate the manner in which Call Center representatives are trained regarding issues such as billing

calculations, wastewater usage calculations, and service territories. Make improvements when necessary.

- B. Implement methods to ensure that the Company's Call Escalation Policy is followed, and reviewed periodically, to ensure compliance for all Missouri calls.
- C. Perform a comprehensive operational audit of the American Water Works Company, Inc. Call Centers that serve Missouri-American customers. The audit should commence in calendar year 2016 and include, but not be limited to, operational areas such as: call quality control; adherence to Company Call Center policies and procedures; accurate and timely responses to customer inquiries, including those regarding billing; appropriate call escalation to supervisory personnel; verification of return calls to customers; accurate calculation of bills from multiple Missouri service territories with differing tariffs; and call center performance metrics.
- D. Design and implement a procedure to ensure all Missouri-American customers requesting a return or follow-up phone call from the Company's Call Center, including those requested from supervisory personnel, have their calls returned.
- E. Ensure that all Missouri-American customer calls to the Company's Call Center are documented with detail on the customer's account, including steps and Company commitments made to obtain resolution.

- F. Develop a system to monitor the types of inbound calls received at the Company's Call Center so the Company can identify critical customer reported trends and respond with corrective action if necessary.
- G. Evaluate the benefits of reducing the number of regulated utilities within American Water Works Company, Inc., in which Call Center representatives are required to be experts. Analyze the merits of specializing Call Center representatives into fewer states.
- H. Inform the Staff and the Office of the Public Counsel promptly when significant operational or service quality performance changes are planned or occur.
- I. Record one hundred percent of all customer calls between Call Center Representatives and Missouri-American customers. Archive recorded phone calls for a period of no less than 12 months, in a manner that they may be retrieved and reviewed by the Company, Staff, and Public Counsel.

The Commission directed Missouri-American to respond to Staff's recommendations, which it did on July 20.

Missouri-American's response indicated it would comply with all of Staff's recommendations, and on August 5, Staff replied that it was satisfied with Missouri-American's response. Staff advised the Commission to close this file, but asked the Commission to first order Missouri-American to submit certain status reports and additional studies, analysis and audits to document compliance with Staff's recommendations. Missouri-American responded on August 12, indicating its willingness to comply with Staff's requests.

The Commission will accept Staff's Final Report as a resolution of this investigation and will direct Ameren-Missouri to comply with the recommendations offered by Staff.

THE COMMISSION ORDERS THAT:

1. Missouri-American Water Company shall comply with the recommendations offered by Staff in its Final Report of June 15, 2015.

2. Missouri-American Water Company shall submit Implementation Status Reports to the Staff until all Company commitments identified in its July 20, 2015 response have been completed, specifically including commitments regarding Recommendations 3, 6, 7, and 9. Such Implementation Status Reports shall include the Company's implementation plan for each recommendation, a description of the Company's actions taken to date, and dates actions were accomplished. Such Implementation Status Reports shall be provided quarterly and shall be discontinued when Staff concludes the Company has sufficiently met the intent of the recommendations.

3. Missouri-American Water Company shall provide to Staff the studies, analysis, and audits that it is currently performing or will perform in response to Staff's recommendations.

4. Missouri-American Water Company shall continue meeting with Staff, as determined necessary by Staff, to address call center and other service quality performance matters as they arise, and to discuss the Company's progress regarding the recommendations made in this case, and other topics.

5. This order shall be effective on August 29, 2015.

6. This file shall be closed on August 30, 2015.



BY THE COMMISSION

Morris L. Woodruff

Morris L. Woodruff
Secretary

Hall, Chm., Stoll, Kenney, Rupp,
and Coleman, CC., concur.

Woodruff, Chief Regulatory Law Judge